



July 31, 2013

VIA ELECTRONIC MAIL

Amelia Pigott, Esq.  
U.S. Environmental Protection Agency  
Region 8  
1595 Wynkoop Street  
Denver, Colorado 80202

**Re: RockTenn CP, LLC Request for Confidential Business Information Treatment of Certain Documents Produced to U.S. EPA in Response to Request for Information Pursuant to Section 104(e) of CERCLA, Former Smurfit-Stone Mill Site, Missoula County, Montana**

Dear Ms. Pigott:

As we discussed, RockTenn CP, LLC ("RockTenn") believes that the following documents it has submitted to U.S. EPA in response to the Agency's Request for Information Pursuant to Section 104(e) of CERCLA, Former Smurfit-Stone Mill Site, Missoula County, Montana (the "Information Request") are entitled to treatment as confidential business information:

(1) All documents relating to Smurfit-Stone Container Corporation's acquisition of the former Missoula Mill site and its disposition of the property in 2011 (Bates No. C00000001 through C00000608 (except for the publicly available documents relating to the Smurfit-Stone bankruptcy case) and P00000001-P00004555) (collectively, the "Mill Purchase and Sale Agreements"); and

(2) All policies of insurance provided in response to the Information Request (Bates No. IC00000001-IC00000214; IE00000001-IE00001566; IG00000001-IG1404; IG00001505-IG00003593; IU00000001-IU00005361; IU 00002884-IU00005361; IC00000203-IC00000208 (collectively, the "Insurance Contracts").

The Mill Purchase and Sale Agreements and the Insurance Contracts are not publicly available, and these contracts are not the types of documents that business enterprises provide to third parties absent a statutory or other legal requirement to do so. Disclosure or dissemination of these documents to third parties under the Freedom of Information Act ("FOIA") might adversely affect our current and future business relationships. It also would be detrimental to RockTenn's business interests. Among other things, disclosure of RockTenn's Mill Purchase and Sale Agreements and Insurance Contracts could provide an unfair advantage to parties who may seek to file various types of claims, including non-environmental claims, against RockTenn.

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If you have any questions about RockTenn's business confidentiality claim, please contact me at 770-326-8130 (phone), 770-856-1851 (cell) or by electronic mail at [nbutler2@rocktenn.com](mailto:nbutler2@rocktenn.com).

Sincerely,

/s/

Nina E. Butler

Senior VP & Environmental Counsel

Enclosures

Cc: Roy Cobb, Esq.  
Chris Berg, Esq.  
Steve Hamilton